

Message

From: Michael Honeycutt [Michael.Honeycutt@tceq.texas.gov]
Sent: 6/18/2020 3:22:21 PM
To: Brennan, Thomas [Brennan.Thomas@epa.gov]
CC: Armitage, Thomas [Armitage.Thomas@epa.gov]
Subject: Re: OP's new Tier 1 proposed rule

I agree.

Mike

From: Brennan, Thomas <Brennan.Thomas@epa.gov>
Sent: Thursday, June 18, 2020 10:12 AM
To: Michael Honeycutt <Michael.Honeycutt@tceq.texas.gov>
Cc: Armitage, Thomas <Armitage.Thomas@epa.gov>
Subject: FW: OP's new Tier 1 proposed rule

Hi Mike,

In addition to the Office of Air BCA proposed rule, there was also one additional Tier 1 rule from the Office of Policy (attached). OP let me know they view that as a procedural policy rule on internal EPA guidance. After reading it over, I agree with OP's assessment and don't see the need for SAB being engaged on a review. However, I would like you to also look this over and see if you agree.

Thanks for looking this over,

Tom

From: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>
Sent: Thursday, June 18, 2020 10:47 AM
To: Brennan, Thomas <Brennan.Thomas@epa.gov>
Cc: Johnston, Khanna <Johnston.Khanna@epa.gov>; Armitage, Thomas <Armitage.Thomas@epa.gov>; Cortes, Emilio <Cortes.Emilio@epa.gov>
Subject: RE: OP's new Tier 1 proposed rule

I believe someone has access to the ADP tracker. Is that right? I think there is a description there. I also just went to regs.gov and you can find it.

I found it very easily so not sure if folks know how to search the website but I suspect this is the information you are looking for.

<https://www.regulations.gov/document?D=EPA-HQ-OA-2020-0128-0001>

Helena Wooden-Aguilar
Deputy Associate Administrator
Office of Policy
U.S. Environmental Protection Agency
202-564-0792 (Work)

Ex. 6 Personal Privacy (PP)

wooden-aguilar.helena@epa.gov

From: Brennan, Thomas <Brennan.Thomas@epa.gov>
Sent: Thursday, June 18, 2020 10:32 AM
To: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>
Cc: Johnston, Khanna <Johnston.Khanna@epa.gov>; Armitage, Thomas <Armitage.Thomas@epa.gov>; Cortes, Emilio <Cortes.Emilio@epa.gov>
Subject: RE: OP's new Tier 1 proposed rule

Is there any link to some briefing materials or summary of the rule. I am sure you are right, but for my own due diligence I would like to review any communications materials. I have encountered cases where the EPA rule "owner/leader" has said there is no science only policy and the Board has disagreed. I doubt it is the case here, but more information/materials would be helpful.

Thanks Helena,

Tom

From: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>
Sent: Thursday, June 18, 2020 10:26 AM
To: Brennan, Thomas <Brennan.Thomas@epa.gov>
Cc: Johnston, Khanna <Johnston.Khanna@epa.gov>; Armitage, Thomas <Armitage.Thomas@epa.gov>; Cortes, Emilio <Cortes.Emilio@epa.gov>
Subject: RE: OP's new Tier 1 proposed rule

Tom – apologies for the delay. I have checked in with ORPM and the response to your question is as following:

- The OP new proposed rule is an internal procedural rule about issuing guidance. It does not have science foundational elements.

Let me know if you have any additional questions.

Helena

Helena Wooden-Aguilar
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Office of Policy
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Ex. 6 Personal Privacy (PP)

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From: Brennan, Thomas <Brennan.Thomas@epa.gov>
Sent: Thursday, June 18, 2020 10:23 AM
To: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>
Cc: Johnston, Khanna <Johnston.Khanna@epa.gov>; Armitage, Thomas <Armitage.Thomas@epa.gov>
Subject: Re: OP's new Tier 1 proposed rule

Thank you Helena,

I appreciate your support on this one.

Tom

Sent from my iPhone

On Jun 18, 2020, at 10:12 AM, Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov> wrote:

Apologies. I will response by COB today. Its been a crazy couple of days.

Helena Wooden-Aguilar
Deputy Associate Administrator
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202-564-0792 (Work)

Ex. 6 Personal Privacy (PP)

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From: Brennan, Thomas <Brennan.Thomas@epa.gov>

Sent: Thursday, June 18, 2020 10:09 AM

To: Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>

Cc: Johnston, Khanna <Johnston.Khanna@epa.gov>; Armitage, Thomas <Armitage.Thomas@epa.gov>

Subject: Re: OP's new Tier 1 proposed rule

Hi Helena,

I am not sure if you had a chance to look into background information on this OP rule yet, but SABSO could use your help with some basic info in this one.

Thanks!

Tom

Sent from my iPhone

On Jun 16, 2020, at 11:06 AM, Brennan, Thomas <Brennan.Thomas@epa.gov> wrote:

Hi Helena,

As part of our monthly review of the Tier 1 and 2 rules that come out of the agency, we noticed one from OP on issuing guidelines. I am trying to determine if this proposed rule has an science foundational elements that the SAB may be interested in reviewing. Can you send me some background information on the proposed rule?

Thanks,

Tom Brennan
Director, Science Advisory Board Staff Office
US Environmental Protection Agency

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